MEMO ORDER

LOCATION: P. 12 MAIN STREET, ANYTOWN

WORK OP: DELOAD 25X

	OLD	NEW
IN COUNT	1234, 1-300	SAME
OUT COUNT	1234, 1-300	SAME
LATERAL	1234, 101-200	SAME
LCC	1234, 201-300	1234, 201-275 + 25 XD

30. A Bridged Tap Removal Splice is very similar:

MEMO ORDER

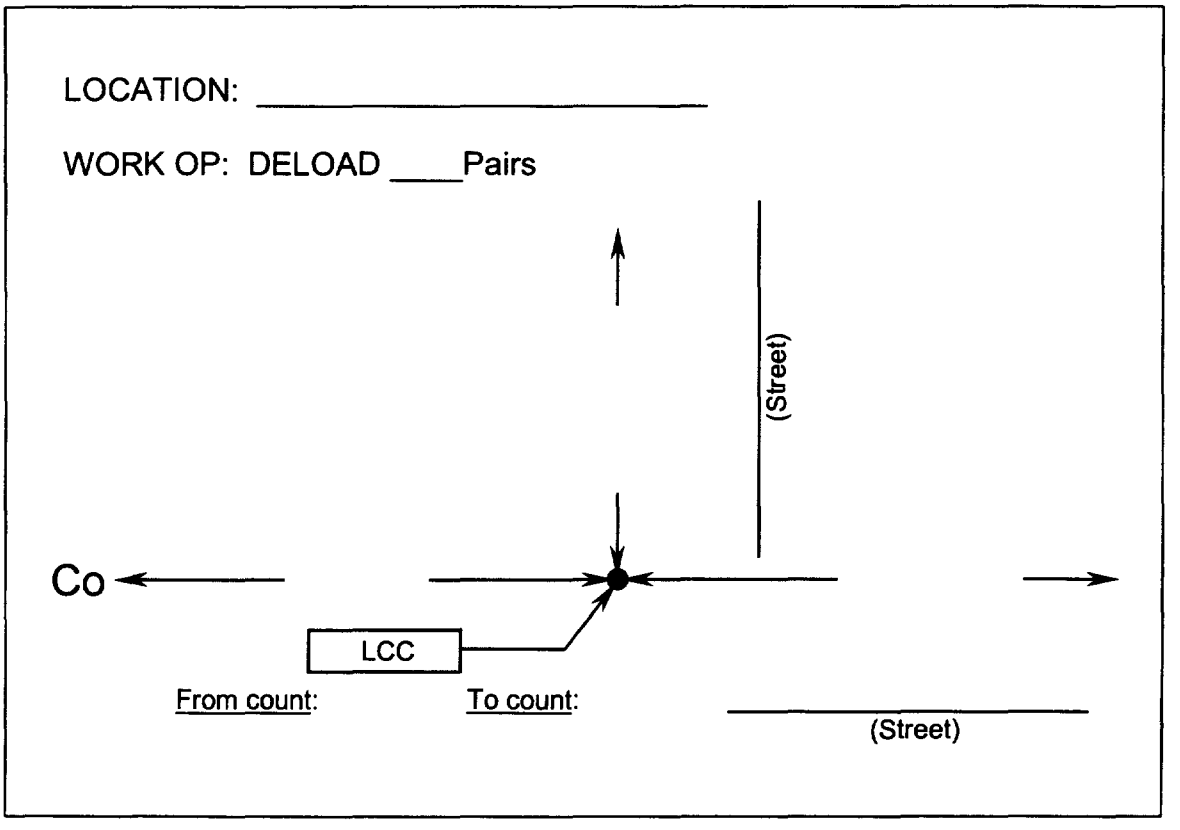
LOCATION: P. 12 MAIN STREET, ANYTOWN

WORK OP: REMOVE 25X BRIDGED TAP

	OLD	NEW
IN COUNT	1234, 1-300	SAME
OUT COUNT	1234, 1-300	SAME
LATERAL	1234, 101-200	1234, 101-175 + 25 XD
LCC	1234, 201-300	SAME

31. If, for some reason, the engineer preferred to use a splice drawing, which is not necessary, he or she should simply create a "fill in the blanks" diagram of a 3-way splice and a "fill in the blanks" diagram of a 4-way splice. A deloading or bridged tap splice must be either a 3-way or a 4-way splice, because only two

cables can properly come out of each end of a splice case. Such a 4-way splice template would look like the following:



32. A forward-looking efficient company would make this a "fill-in-the-blanks" computer screen that would be part of an automated flow-through process. An engineer or engineering clerk (but not both) would still fill in several of the blanks, but the extent of the manual effort would be minimal, taking just a few short minutes.

33. In other jurisdictions, Verizon has suggested that the engineer must layout the entire route of the cable pair and indicate the change at every splice point for record keeping purposes. The reality is that the engineers need only treat the cable pair where physical work will be performed, *i.e.*, at each the load points

(presumably 2 - 4 locations) and/or each bridged-tap location (potentially 1 – 3 locations) and/or sometimes at the termination points. The work required is significantly less than the myriad locations per mile that Verizon would lead one to believe must be addressed. Personnel are well versed on following the count changes required for posting/pre-posting records perform this function. Therefore, the time required is not substantial. Relative to forward-looking and efficient practices, we are aware that BellSouth has recently described that its mechanized record system "Map Viewer" can generate the information described in this task in less than a minute for any cable pair in the State of Florida.

Line 23. Check for and obtain any necessary permits:

34. Deloads and unbridging in the underground and aerial plant do not require special permits. In other jurisdictions Verizon has attempted to justify the time reported for obtaining permits to perform conditioning work. Contrary to Verizon's efforts to suggest that this is a common occurrence, throughout his extensive career, which includes work in plant locations in each of the former Bell System entities, Mr. Riolo recalls only one location that required an opening permit (for a manhole buried and covered in Central Park in Manhattan). Although the need for a permit to perform conditioning work is possible, it is a rare exception, certainly not a normal requirement. Engineers design plant to be accessible, and only when no reasonable alternative exists would they place plant in areas that require special permits.

Line 24. Order equipment (if required) and update TIRKS (if appropriate):

35. This is an error. Deloads and unbridging of POTS lines require no extraordinary equipment, and POTS lines are not inventoried in TIRKS. Although Verizon has previously indicated this item is for equipment "**if required**" and for TIRKS "**if appropriate**," the cost has still been charged 100 percent of the time. Moreover, the cost has been charged to line "conditioning," in error, because this task is *never* required.

Line 25 and 26. Send schematic to Engineering Clerk for drafting of work print and preposting of cable plat(s). Receive schematic from engineer for drafting:

36. This step is probably unnecessary because the services of a drafter are not required for a simple deload or bridged tap removal splice. Even if the step were required, Verizon's proposed time for the engineer to hand the schematic to the drafter and offer minor explanations/directions is absurd. One minute might be more appropriate. A forward-looking efficient company would have automated step 22, which would make this function unnecessary.

Line 27. Complete the work print:

37. As indicated above, for a deload/unbridging job, the drawing involves only displaying a simple line diagram, symbols, cable number and count, and template type information. The work order can literally take the form of a memo. A forward-looking efficient company would have automated step 22, which would make this function unnecessary.

Line 28. Pre-post cable plat(s):

38. Pre-posting minor numbers of locations in connection with deload or unbridging involves bracketing the cable pair affected and showing its change status to non-loaded. If Verizon is responsive to competitors, the line "conditioning" will occur so quickly that the job will be completed fast enough to go directly to a final posting of the change. A forward-looking efficient company would have automated step 22, which would make this function unnecessary.

Line 29. Update LFACS and LIVEWIRE:

39. Updating LFACS and LIVEWIRE in connection with deloading or unbridging requires changing the status of the pair or the termination — a function that should take very few minutes. A forward-looking efficient company would make this a flow-through, automated function, triggered when the technician keys in a *"Completed Step"* on a *Craft Access Terminal*, thereby requiring no human intervention.

Line 30/31. Forward completed work product to Engineer. [Engineer] review[s] final design from drafting:

40. The engineer receives the work print and reviews the deload/unbridge job. The line "conditioning" change is merely scan-checked by the engineer. This is not a complex engineering work order. A forward-looking efficient company would have automated step 22, which would make this function unnecessary.

Line 32. Acquire necessary and appropriate approval:

41. This type of simple job is normally authorized directly by the engineer herself or himself. At most, such a routine work order would require no more than simply the group manager's signature. This step is unnecessary.

Line 33. Schedule work with Construction:

42. Work may be scheduled on a regular routine basis, or it can be service order work done immediately. A deload/unbridging work order is service order work requiring immediate attention, not placement on a 30-60-90-day routine construction workload. This step is unnecessary.

Line 34. Send copies of engineering work order to Construction and Accounting:

43. If 30-60-90-day construction scheduling was appropriate (which it is not), then this step would come before step 33, because work would not be scheduled until after the print was received. Even in a cumbersome manual mode, it does not take 20 minutes to fax a Memo Order or Service Order Job to Construction. Also an error is the transmittal to the Accounting department, which does not receive copies of 'M' (rearrangement) work, but should only receive copies of jobs involving the disbursement or retirement of non-exempt capital assets. A forward-looking efficient company would make this work distribution function part of an automated flow-through process, thereby requiring no human intervention.

Line 35. Receive completion notice from Construction:

44. Unless there are questions raised about the job, the notification of job completion flows automatically to engineering via ECRIS. In addition, the scheduling engineer is notified at the scheduling meeting of completed work.

Line 36. Complete and forward billing information to Special Billing Unit:

45. This step is unnecessary because this proceeding will establish a fixed price for line "conditioning." This type of function is only required for custom work orders, and even then each work force codes its time (and materials if applicable) for billing preparation.

Line 37. Receive completion notice from Construction and final post the work order on the cable plat(s):

46. The receiving of a "completion notice" should simply be an electronic notification of completion via ECRIS. If the work was not pre-posted, then it takes only a few minutes to post the records. Otherwise, if the work is already pre-posted (see line 25), final posting is a relatively minor task.

Line 38. Send final completion notice to Accounting (Assets):

47. This is a mistake. This is 'M' (rearrangement) work that is not sent to the Accounting department. There are no assets (Items of Plant) changed on the books of the corporation. Although Verizon correctly indicates this item is only for [new] Assets, Verizon has still charged the cost to line "conditioning," in error.

48. Should the Commission decide to compensate Verizon for an engineering cost associated with "conditioning" loops, the Commission should recognize that an efficient company would only need to issue one Engineering Work Order for each job to "condition" multiple loops. Thus, at most, the Commission should only allow Verizon to recover the restated Engineering Work Order cost on a "per unit basis," with the cost spread across the average number of loops to be "conditioned" per order. Based on a hypothetical labor rate of $45 per hour, the

Engineering Work Order would add from $0.90/pair to $1.86/pair ($45 per hour multiplied 1.2 and 2.48 minutes per pair, respectively) for removing load coils and from $0.45/pair to $0.93/pair for removing bridged tap ($45 per hour multiplied 0.6 and 1.24 minutes per pair, respectively).

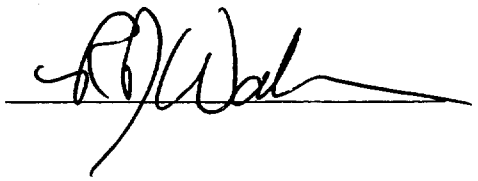
I, Terry L. Murray, hereby swear and affirm that the foregoing rebuttal testimony was prepared by me or under my direct supervision or control and is true and accurate to the best of my knowledge and belief.

Signed:

Terry L. Murray

I, Richard J. Walsh hereby swear and affirm that the foregoing rebuttal testimony was prepared by me or under my direct supervision or control and is true and accurate to the best of my knowledge and belief.

Signed:



I, Joseph P. Riolo, hereby swear and affirm that the foregoing rebuttal testimony was prepared by me or under my direct supervision or control and is true and accurate to the best of my knowledge and belief.

Signed: